

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )  
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 Streamlining the International ) IB Docket No. 95-118  
 Section 214 Authorization Process and )  
 Tariff Requirements )

COMMENTS OF WORLDCOM, INC.

WorldCom, Inc. ("WorldCom") hereby submits its Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") released July 17, 1995 in the above-captioned proceeding. WorldCom is one of the four largest U.S. providers of domestic and international long distance telephone services.<sup>1/</sup> As a major facilities-based provider of international services, WorldCom is particularly interested in the proposals set forth in the NPRM.

WorldCom strongly supports the Commission's efforts to eliminate unnecessary burdens on international common carriers by streamlining Section 214 filing and processing requirements. WorldCom has long been an active proponent of streamlining. In June 1988, over seven years ago, IDB began discussions with the International Facilities Division regarding streamlined processing of certain Title III earth station applications. In February 1989, IDB filed an eight-page letter with the International Facilities Division outlining its proposals. Since that time, in various meetings and by various letters, IDB has

<sup>1/</sup> In December 1994, LDDS Communications, Inc. ("LDDS") purchased IDB Communications Group, Inc. ("IDB"). In January 1995, LDDS purchased WilTel, Inc. In May 1995, LDDS changed its name to WorldCom, Inc.

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proposed a variety of means for streamlining the processing of international Section 214 and Title III applications.

WorldCom applauds the substantial efforts of the International Bureau to implement, on its own and through the NPRM, streamlined processing. WorldCom is pleased that the International Bureau has not only adopted or proposed adoption of the many proposals made by IDB over the past seven years but gone beyond those proposals to recommend more fundamental changes.

In its Comments, WorldCom proposes that the Commission clarify or modify its proposal to grant a global Section 214 authorization to include the use of non-U.S. separate satellite systems within such an authorization. WorldCom opposes the Commission's proposals to reduce from 30 days to 28 days or 21 days the public comment period on Section 214 applications. WorldCom supports the option of filing Section 214 applications on computer diskette, so long as applicants are required to submit a paper copy of their applications. WorldCom sees no reason for the Commission to create a form for filing Section 214 applications. WorldCom supports application of streamlined domestic tariffing requirements to international services provided by non-dominant carriers. WorldCom fully supports all of the Commission's other proposals in the NPRM.

A. Facilities-Based Section 214 Authorizations

WorldCom wholeheartedly supports the Commission's proposal to grant a global Section 214 authorization to non-dominant carriers not affiliated with a foreign carrier. NPRM at ¶10. Such a blanket authorization will enable carriers to rapidly enter new markets or use new facilities without the unnecessary burden of a Section 214 application for

each new market or new facility. WorldCom notes that it has over 500 Section 214 authorizations. Under the proposed new rules, WorldCom would require only one global Section 214 authorization and a handful of specialized authorizations.

WorldCom requests that the Commission clarify, or if appropriate, expand its proposal to grant global Section 214 authorizations to include the use of non-U.S. separate satellite systems, including, but not limited to, the Mexican Morelos/Solidaridad system, the Canadian ANIK system, and various Russian satellite systems. The Commission already publishes on a regular basis a list of approved non-U.S. satellite systems, the services that may be provided via these systems, and the countries that may be served. WorldCom proposes that the global Section 214 authorization be deemed to include the delineated non-U.S. satellite systems, services and countries set forth in the Commission's Public Notices. WorldCom sees no reason to exclude these widely used non-U.S. satellite systems from the global Section 214 authorization. The Commission will be able to monitor use of these satellite systems through the Section 43.82 circuit status reports.<sup>2/</sup>

Likewise, WorldCom sees no reason for carriers to file additional Section 214 applications to add circuits on these non-U.S. non-common carrier facilities. Thus, WorldCom asks the Commission to clarify that its proposal in Paragraph 26 of the NPRM --

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<sup>2/</sup> There should no longer be any concern that the number of circuits used on a separate satellite system for interconnected services will exceed the number of circuits permitted by Intelsat before an economic harm analysis must be undertaken. Intelsat has increased the number of permissible interconnected circuits from 1,250 to 8,000, and expects to drop all limits in the near future. 8,000 circuits would occupy more than five full transponders, a level highly unlikely to be reached for interconnected services on non-U.S. satellites. In any case, the same circuit limitation applies to U.S. separate satellite systems. The Commission, as noted, can monitor usage through the circuit status reports.

that once a non-dominant facilities-based carrier obtains an initial Section 214 authorization for a non-common carrier system, it would not have to file additional Section 214 applications to add circuits -- apply with equal force to all non-common carrier facilities, whether U.S. authorized or foreign.

B. Petition to Deny

WorldCom submits that the standard 30-day public comment period has served the public and the Commission well, and that there is no compelling reason to reduce this comment period. WorldCom does not support the Commission's proposal to reduce the comment period on facilities-based applications subject to streamlined processing from 30 days to 21 days and to reduce the comment period on non-streamlined applications from 30 days to 28 days. NPRM at ¶ 46.

In those rare instances where a Petition to Deny may be warranted, WorldCom does not believe that 21 days provides adequate time to prepare the appropriate pleading. WorldCom submits that the additional nine days for filing a Petition to Deny should not unduly delay the application process. If the Petition to Deny is without merit, the Commission should proceed to grant the application expeditiously. If the Petition raises material questions, the additional nine days will have little or no impact upon the timing of the Commission's ultimate decision on the merits.

WorldCom is also concerned that public comment periods of 21, 28 and 30 days for various applications will be unnecessarily confusing. WorldCom does not believe that a 28-day comment period is substantially easier to calculate than the traditional 30-day

period. FCC licensees are well-accustomed to calculating the expiration of the 30-day period.

C. Form of Section 214 Applications

The Commission has proposed that applicants have the option of filing their Section 214 applications on computer diskettes. NPRM at ¶ 48. WorldCom supports this proposal so long as applicants are also required to file paper copies of their applications, which will be made available to the public. WorldCom notes that, although it generally supports steps toward paperless filings, hard copies of applications facilitate public review.

WorldCom sees no reason for the Commission to create a form for filing Section 214 applications. NPRM at ¶ 50. The requirements set forth in the proposed successor to Section 63.01 of the Rules that will govern the filing of international Section 214 applications provide more than enough guidance for applicants to file a complete Section 214 application. The diversity of Section 214 applications will result in a standard form application being a burden, rather than a convenience. In WorldCom's experience, many questions on a form are not applicable, there is inadequate space to answer the questions that are applicable, and supplements are invariably required to submit additional information not specifically requested by the form but relevant to the Commission's consideration of the application.

D. Tariffing Requirements

The Commission has requested comment on whether it should streamline its tariffing requirements for non-dominant resale and facilities-based carriers by permitting such carriers to file their international rates on not less than one day's notice, and, if so, whether

the Commission should regulate such tariff filings under the same rules governing non-dominant interstate tariff filings. NPRM at ¶ 52. WorldCom fully supports the application of streamlined tariff filing requirements to non-dominant international service providers. The provision of international services is highly competitive. There is no reason to impose more burdensome tariffing requirements on a carrier's international services than on a carrier's domestic services.

Respectfully submitted,

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August 23, 1995

## CERTIFICATE OF SERVICE

I, Susanne Deljoubar, hereby certify that I have this 23rd day of August, 1995 sent a copy of the foregoing "Comments of WorldCom, Inc." by first-class U.S. mail, postage prepaid, to the following:

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